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*Counsel to the Majority Second Lien Lenders
to White Birch Paper Company*

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:

BEAR ISLAND PAPER COMPANY, L.L.C.,¹

Debtor.

Case Number: 10-31202-DOT

Chapter 11

MOTION FOR WITHDRAWAL AND FOR SUBSTITUTION OF COUNSEL

John K. Warren moves this Court pursuant to Local Bankruptcy Rule 2090-1(G) for an Order allowing his withdrawal as counsel of record herein for The Majority Second Lien Lenders to White Birch Paper Company and the substitution of David M. Ross, as counsel of record therefore.

In support of this motion, I state as follows:

¹ The last four digits of the Debtor's federal tax identification number are 0914. The principal address for the Debtor is 10026 Old Ridge Road, Ashland, Virginia 23005.

1. I am a member in good standing of the Bar of the Commonwealth of Virginia and the United States Bankruptcy Court for the Eastern District of Virginia.

2. As of Friday, March 26, 2010, I will no longer be associated with Dewey & LeBoeuf LLP and will no longer represent The Majority Second Lien Lenders to White Birch Paper Company in this action. I therefore respectfully request that the Court permit me to withdraw as counsel of record.

3. My colleague, David M. Ross, is a member in good standing of the Bar of the Commonwealth of Virginia and the United States Bankruptcy Court for the Eastern District of Virginia.

4. There are three additional attorneys with Dewey & LeBoeuf LLP for whom *pro hac vice* admission has been sought from this Court, Martin J. Bienenstock, Timothy Q. Karcher, and Arielle Kane (collectively, the “Admittees”).

5. David M. Ross will continue to be associated with the Admittees in this matter. His business address and bar number are as follows:

David M. Ross (VSB #42389)
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6. Pursuant to Local Rule 2090-1(G), The Majority Second Lien Lenders to White Birch Paper Company have been notified of my withdrawal and will continue to be represented by the remaining counsel at Dewey & LeBoeuf LLP. Therefore, no delay or prejudice will occur.

WHEREFORE, John K. Warren respectfully requests that this Court grant this Motion for an Order allowing his withdrawal as counsel of record herein for The Majority Second Lien Lenders to White Birch Paper Company and the substitution of David M. Ross, as counsel of record therefore.

Dated: March 26, 2010
Washington, D.C.

Respectfully Submitted,

/s/ John K. Warren

John K. Warren (VSB #75550)

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CERTIFICATE OF SERVICE

I hereby certify that on March 26, 2010, a copy of the foregoing Motion for Withdrawal and for Substitution of Counsel, together with exhibit and proposed order, was served by U.S. Mail, First Class, postage prepaid, or by electronic means through the Court's ECF system or email on the following, constituting all necessary parties:

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